

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE**

<b>JOHN DOE,</b>	)	
	)	
<i>Plaintiff,</i>	)	
	)	<b>Civil Action No: 3:22-cv-569</b>
<b>v.</b>	)	
	)	
<b>William Lee, Governor of the State of Tennessee, in his official capacity,</b>	)	<b>Judge Richardson</b>
	)	
<i>Et al.</i>	)	<b>Magistrate Judge Newbern</b>
	)	
<i>Defendants.</i>	)	

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**PLAINTIFF'S MOTION TO FILE UNDER SEAL**

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Comes now Plaintiff, by and through Counsel, and moves this Honorable Court pursuant to Local Rule 5.03 and Administrative Practices and Procedures for ECF Filing § 5.07 to authorize Plaintiff to make a sealed filing of the exhibits to his Motion to Proceed Under Pseudonym and for a Protective Order. All three exhibits contain highly sensitive, identifying information that, if publicly disclosed, would totally undermine Plaintiff's motion.

Plaintiff will disclose copies of all three exhibits to Counsels for Defendants within one business day of those Counsels entering their appearance in this matter. Should the Court deny this motion, Plaintiff respectfully requests that in the alternative the Court strike these exhibits from the record so that they are not publicly accessible.

Respectfully submitted,

s/ Kyle Mothershead

Kyle Mothershead, BPR 22953

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**CERTIFICATE OF SERVICE**

I hereby certify that on **August 2, 2022**, Plaintiff's **Motion to File Under Seal** was filed electronically with the Court's electronic filing system. Plaintiff will serve **Defendants Lee and Rausch** on **August 2, 2022** with a copy of this filing along with the Summons and Complaint, and then serve copies of the sealed exhibits attached to this filing via email within one business day of Defendants' Counsels entering an appearance in this matter.

s/ Kyle Mothershead

Kyle Mothershead, BPR 22953